

FINAL DRAFT/PROPOSED CAAPP PERMIT
Ivex Packaging Corporation
I.D. No.: 197045ABH
Application No.: 95090085
December 19, 2003

217/782-2113

RENEWAL
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Ivex Packaging Corporation
Attn: Lawrence J. Rohman
292 Logan Avenue
Joliet, Illinois 60433-1200

<u>Application No.:</u> 95090085	<u>I.D. No.:</u> 197045ABH
<u>Applicant's Designation:</u>	<u>Date Received:</u> September 7, 1995
<u>Operation of:</u> Paper Mill	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date</u> ² : DATE
<u>Source Location:</u> 292 Logan Avenue, Joliet, Will County	
<u>Responsible Official:</u> Lawrence J. Rohman, Manager of Engineering	

This permit is hereby granted to the above-designated Permittee to OPERATE a Paper Mill, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Dan Punzak at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DGP:jar

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	6
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	8
5.0 OVERALL SOURCE CONDITIONS	9
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Testing Requirements	
5.7 General Recordkeeping Requirements	
5.8 General Reporting Requirements	
5.9 General Operational Flexibility/Anticipated Operating Scenarios	
5.10 General Compliance Procedures	
6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)	19
6.1 Description of ERMS	
6.2 Applicability	
6.3 Recordkeeping and Reporting	
7.0 UNIT SPECIFIC CONDITIONS	21
7.1 Unit 01 Gas Turbine	
7.2 Unit 02 Waste Heat Boiler	
7.3 Units 03 and 04 Boilers #3 and #4	
7.4 Unit 05 APP Laminator	
7.5 Units 06 and 07 Asphalt Saturator and Asphalt Laminator	
8.0 GENERAL PERMIT CONDITIONS	47
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	

	<u>PAGE</u>
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	
8.6 Reporting Requirements	
8.7 Obligation to Comply with Title I Requirements	
9.0 STANDARD PERMIT CONDITIONS	52
9.1 Effect of Permit	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirement for Compliance Certification	
9.9 Certification	
9.10 Defense of Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening and Reissuing Permit for Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	
10.0 ATTACHMENTS	
10.1 Attachment 1 - Emissions of Particulate Matter from Process Emission Units	1-1
10.2 Attachment 2 - Example Certification by a Responsible Official	2-1
10.3 Attachment 3 - Guidance on Revising this Permit	3-1
10.4 Attachment 4 - Form 199-CAAPP, Application for Construction Permit (For CAAPP Sources Only)	4-1
10.5 Attachment 5 - Guidance on Renewing this Permit5	5-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Ivex Packaging Corporation
292 Logan Avenue
Joliet, Illinois 60434

I.D. No.: 197045ABH
Standard Industrial Classification: 2621, Paper Mills

1.2 Owner/Parent Company

Ivex Packaging Corporation
200 Tri State, Suite 100
Lincolnshire, Illinois 60069

1.3 Operator

Ivex Packaging Corporation
292 Logan Avenue
Joliet, Illinois 60433-1200

Lawrence J. Rohman, Manager of Engineering
309/686-3830

1.4 General Source Description

Ivex Packaging Corporation produces 100% recycled paper from secondary paper fiber. The plant has three major departments: Paper Mill, Finishing Department, and Waterproof Department. The source operates a power plant which includes boilers and a gas turbine with a heat recovery boiler. The Waterproof Department has three operations which generate emissions: a laminator, a saturator, and an APP laminator.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act, 415 ILCS 5/1 et seq.
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ASTM	American Society for Testing and Materials
Btu	British Thermal Unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
ft ³	cubic feet
gal	gallon
HAP	Hazardous Air Pollutants
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
ISO Standard Conditions	Standard day conditions of 288 degrees Kelvin, 60 percent relative humidity and 101.3 kilopascals pressure
kg	kilogram
kPa	kilopascals
lb	pound
m ³	cubic meters
Mft ³	million cubic feet
Mg	Megagrams or Metric Tonnes
mmBtu	Million Btus
mmHg	millimeters of Mercury
mo	Month
MW	Megawatts
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
SO ₂	Sulfur Dioxide
T	Ton
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TOC	Total Organic Compounds
tpy	tons per year
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt.	Weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

Existing asphalt tanks with capacities between 10,000 and 20,000 gallons, constructed on or before November 18, 1980.

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

APP Laminator Tank

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

- a. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons provided the tank is not used for the storage of gasoline or any material listed as a hazardous air pollutant pursuant to Section 112(b) of the Clean Air Act [35 IAC 201.210(a) (10)].
- b. Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a) (11)].
- c. Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, diluents, fountain solutions, and cleaning materials [35 IAC 201.210(a) (14)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Solar Turbine Incorporated Gas Turbine Model # Centar HT-5701 (Gas Turbine)	1988	None
02	Waste Heat Boiler	1988	None
03	S and G Natural Gas-Fired Boiler (Boiler #3)	Prior to 1973	None
04	B and W Natural Gas-Fired Boiler (Boiler #4)	Prior to 1973	None
05	APP Laminator	Prior to 1973	None
06	Asphalt Saturator	Prior to 1973	None
07	Asphalt Laminator	Prior to 1973	None
PM Fugitive Emissions	Paved and Unpaved Roadways and Parking Lots	----	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at the source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
 - b. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minute period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 feet) radius from the center point of any such emission unit owned or operated by the Permittee and provided further that such more opaque emissions permitted from each such emission unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123 and 212.124.
- 5.2.3 Fugitive Particulate Matter Operating Program
 - a. This source shall be operated under the provisions of an Operating Program for Fugitive Particulate Matter (Operating Program) prepared by the Permittee and submitted to the Illinois EPA for its review. Such Operating Program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

- b. The Operating Program shall be amended from time to time by the owner or operator so that the Operating Program is current. Such amendments shall be submitted to the Illinois EPA pursuant to 35 IAC 212.312.
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the Operating Program [35 IAC 212.306].

5.2.4 Any storage vessel with a capacity greater than or equal to 40 m³ (approximately 10,600 gallons) that is used to store volatile organic liquids (VOLs) for which construction, reconstruction, or modification is commenced after July 23, 1984 is subject to the NSPS for Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60 Subpart Kb.

5.2.5 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.6 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.7 Future Regulations

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.8 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.9 PM₁₀ Contingency Measure Plan

Should this stationary source, as defined in 35 IAC 212.700, become subject to the requirement to prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.703, then the owner or operator shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented in accordance with 35 IAC 212.704. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U, incorporated herein by reference.

5.3 Non-Applicability of Regulations of Concern

- 5.3.1 NSPS for Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.
 - a. Except as provided in Condition 5.7.2 (see also 40 CFR 60.116b) storage vessels with design capacity less than 75 m³ (~ 20,000 gallons) are exempt from the General Provisions of the NSPS and from the provisions of 40 CFR 60 Subpart Kb [40 CFR 60.110b(b)].
 - b. Except as provided in Condition 5.8.1(b) (see also 40 CFR 60.116b) storage vessels with design capacity greater than 75 m³ but less than 151 m³ (~ 40,000 gallons) storing a liquid with a maximum true vapor pressure less than 150 kPa are exempt from the General Provisions of the NSPS and from the provisions of 40 CFR 60 Subpart Kb [40 CFR 60.110b(c)].

5.3.2 This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source does not have a pollutant-specific emissions unit that uses an add-on control device to achieve compliance with an emission limitation or standard.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO _x)	189.36
Particulate Matter (PM)	23.95
Sulfur Dioxide (SO ₂)	17.74
Volatile Organic Material (VOM)	9.64
HAP, not included in VOM or PM	----
Total	240.69

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the Clean Air Act not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, the Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA.

5.6 General Testing Requirements

- 5.6.1 Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act and 35 IAC 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute.
- 5.6.2 Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A and 35 IAC 212.109, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.

5.7 General Recordkeeping Requirements

5.7.1 NSPS Recordkeeping

- a. Any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility [40 CFR 60.7(b)]
- b. Any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all performance testing measurements and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, reports, and records [40 CFR 60.7(e)].

5.7.2 Records for Storage Vessels

- a. The owner or operator of each storage vessel for which construction, reconstruction, or modification is commenced after July 23, 1984 with a design capacity greater than or equal to 40 m³, but less than 75 m³ shall keep readily accessible records showing the dimension of the storage vessel and an

analysis showing the capacity of the storage vessel. Each storage vessel with a design capacity less than 75 m³ is subject to no other provision of 40 CFR 60 Subpart Kb other than those required by this paragraph. This record shall be kept for the life of the source [40 CFR 60.110b(a), 60.116b(a), and 60.116b(b)].

- b. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 IAC Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel [35 IAC 218.129(f)].

5.7.3 Records of Visible Emissions

Records of the opacity of emissions from an emission unit shall be maintained to demonstrate compliance with the limitations of 35 IAC 212.123. These shall consist of:

- a. Records of opacity observation conducted on the emission unit; and
- b. Records noting any instances where the opacity appear to be in excess of the limitations specified in Condition 5.2.2(b).

5.7.4 Records of Fugitive Emissions from Road Dust

- a. The Permittee shall maintain a record of the maximum aggregate annual emissions of fugitive PM (i.e., road dust) estimated based on the applicable emission factors and formulas specified by Condition 5.10.2, with supporting calculations, so as to demonstrate compliance with the limits in Condition 5.5.
- b. This record shall be updated upon construction of additional roadways or parking areas or other permanent change to the source that alters the maximum aggregate emissions of PM.

5.7.5 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA, and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request.

- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA request for records during the course of a source inspection.

5.8 General Source Wide Reporting Requirements

5.8.1 The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.8.2 NSPS Reporting Requirements

- a. Pursuant to 40 CFR 60.7(a)(1), the Permittee shall furnish the Illinois EPA written notification of the date of reconstruction of an existing facility is commenced so that it will become an affected facility subject to the provisions of 40 CFR Part 60 postmarked no later than 30 days after such date [40 CFR 60.7(a)(1)].
- b. The owner or operator of each storage vessel with a design capacity greater than 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure that this normally less than 27.6 kPa shall notify the Illinois EPA or the USEPA within 30 days when the maximum true vapor pressure of the liquid exceeds 27.6 kPa (the maximum true vapor pressure for this volume range) [40 CFR 60.116b(d)].

5.8.3 Annual Emissions Report

Annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous year.

5.8.4 Exceedance of Emission Limits

Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Compliance Section of emissions of NO_x, PM, SO₂, or VOM from the source in excess of the limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

5.9 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.10 General Compliance Procedures

5.10.1 NSPS Compliance Procedures

Pursuant to 40 CFR 60.116b(e), available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below:

- a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service [40 CFR 60.116b(e) (1)].
- b. Pursuant to 40 CFR 60.116b(e) (2), for crude oil or refined petroleum products the vapor pressure may be obtained by the following:
 - i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in American Petroleum Institute (API) Bulletin 2517, unless the Illinois EPA or the USEPA specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from sample(s) [40 CFR 60.116b(e) (2) (i)].
 - ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
- c. Pursuant to 40 CFR 60.116b(e) (3), for other liquids, the vapor pressure:
 - i. May be obtained from standard reference texts [40 CFR 60.116b(e) (3) (i)];
 - ii. Determined by ASTM Method D2879-83 [40 CFR 60.116b(e) (3) (ii)];

- iii. Measured by an appropriate method approved by the Illinois EPA or USEPA [40 CFR 60.116b(e) (3) (iii)]; or
- iv. Calculated by an appropriate method approved by the Illinois EPA or the USEPA [40 CFR 60.116b(e) (3) (iv)].

5.10.2 General Procedures for Calculating Fugitive Emissions from Roadways

For the purpose of estimating fugitive PM emissions from the roadways at the source, the emission factors and formulas in Sections 13.2.1 and 13.2.2 of the AP-42, Volume I, Supplement F, January, 1995 are acceptable.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Gas Turbine

7.1.1 Description

A gas turbine is used to power an electric generator and provide electricity at the source. The gas turbine is equipped with a dual fuel system, for operation on natural gas or distillate fuel oil.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Rated Heat Input	Emissions Control Equipment
01	Gas Turbine	53.3 mmBtu/hr	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected gas turbine" for the purpose of these unit-specific conditions is a gas turbine that is subject to the NSPS for Stationary Gas Turbines, 40 CFR 60 Subparts A and GG, because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour (10 mmBtu/hr), based on the lower heating value of the fuel fired and the gas turbine commenced construction, modification, or reconstruction after October 3, 1977, and that has a peak load less than or equal to 107.2 gigajoules per hour (100 mmBtu/hr). The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.

i. Standard for Nitrogen Oxides:

- A. Pursuant to 40 CFR 60.332(a)(2), no owner or operator of an affected gas turbine shall cause to be discharged into the atmosphere from such gas turbine, any gases which contain nitrogen oxides in excess of:

$$\text{STD} = 0.0150 \frac{(14.4)}{Y} + F$$

Where:

STD = Allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = Manufacturer's rated heat rate at manufacturer's peak load (kilojoules per watt hour), or

actual measured heat rate based on lower heater value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen calculated from the nitrogen content of the fuel as follows:

Fuel-Bound Nitrogen (Percent by Weight)	F (NO _x Percent by Volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	0.04 (N)
$0.1 < N \leq 0.25$	$0.04 + 0.0067 (N - 0.1)$
$N > 0.25$	0.005

Where:

N = The nitrogen content of the fuel (percent by weight) determined in accordance with Condition 7.1.8.

- B. An affected gas turbine is exempt from Condition 7.1.3(b) (i) (A) when being fired with distillate fuel oil, as such oil is an emergency fuel used only during circumstances such as natural gas curtailment or system breakdown that make it impossible to fire natural gas [40 CFR 60.332(k)].

ii. Standard for Sulfur Dioxide

An affected gas turbine is hereby shielded from the SO₂ standard pursuant to 40 CFR 60.333. This shield is issued to streamline applicable requirements for an affected turbine, based on the Illinois EPA's finding that compliance with Condition 7.1.3(c) assures compliance with 40 CFR 60.333, following review of 40 CFR 60.333 and 35 IAC 214.122(b) (2) and 214.304. This shield does not extend to the procedures for verifying the sulfur content of the fuel.

- c. Pursuant to 35 IAC 214.122(b) (2) and 214.304, no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from the burning of fuel at process emission units located in the Chicago major metropolitan area with

actual heat input smaller than, or equal to 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hr of actual input when distillate fuel oil is burned (0.3 lb/mmBtu).

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected gas turbine is not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected gas turbine is not by definition a fuel combustion emission unit.
- b. The affected gas turbine is not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected gas turbine is not by definition a fuel combustion emission unit.
- c. This permit is issued based on the affected gas turbine not being subject to 35 IAC 212.321 because due to the unique nature of this process, such rules cannot reasonably be applied.

7.1.5 Operational and Production Limits and Work Practices

- a. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected gas turbine in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or the USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source [40 CFR 60.11(d)].
- b. An affected gas turbine shall only be fired with natural gas or distillate fuel oil.

- c. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values shall not be used in an affected gas turbine:
 - i. 0.28 weight percent, or
 - ii. The Wt percent given by the formula: Maximum Wt percent sulfur = $(0.000015) \times (\text{Gross heating value of oil, Btu/lb})$.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the affected gas turbine is subject to the following:

Operation and emissions of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Heat Input (mmBtu/Hr)</u>	<u>Nitrogen Oxide Emissions (Lb/Hr)</u>	<u>(tpy)</u>
Gas Turbine	53.3	30.2	132.3

These limits are based on the maximum actual heat input, the maximum hours of operation (8,760 hr/yr), and the maximum allowable emissions, based on the limit of the NSPS.

The above limitations were established in Permit 87110037, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.1.7 Testing Requirements

- a. To compute the nitrogen oxide emission limit standard, the Permittee shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Illinois EPA or the USEPA to determine the nitrogen content of the fuel fired [40 CFR 60.335(a)].
- b. The Permittee shall determine compliance with the sulfur content standard in Condition 7.1.3(c) as follows: ASTM D2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D1072-80, D3031-81, D4084-82, or D3246-81 shall be used for the sulfur content of gaseous fuels. The applicable

ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Illinois EPA or the USEPA [40 CFR 60.335(d)].

- c. To meet the requirements of Condition 7.1.8 (see also 40 CFR 60.334(b)), the owner or operator shall use the methods specified in Conditions 7.1.7(a) and (b) (see also 40 CFR 60.335(a) and (d)) to determine the nitrogen and sulfur contents of the fuel being burned. The analysis may be performed by the Permittee, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified Agency [40 CFR 60.335(e)].

7.1.8 Monitoring Requirements

Pursuant to 40 CFR 60.334(b), the Permittee shall monitor sulfur content and nitrogen content of the fuel being fired in an affected gas turbine. The frequency of determination of these values shall be as follows:

- a. For distillate fuel oil, which is supplied from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source [40 CFR 60.334(b)(1)].
- b. For natural gas, which is supplied without intermediate bulk storage, the values shall be determined and recorded every 6 months. This is a custom schedule for determination of the values based on the design and operation of the affected gas turbine and the characteristics of the fuel supply, substantiated with data submitted to and approved by the Illinois EPA [40 CFR 60.334(b)(2)].

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.7, the Permittee shall maintain records of the following items for the affected gas turbine to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, and 7.1.6 pursuant to Section 39.5(7)(b) of the Act:

- a. An operating log for each affected gas turbine that includes the information required by Condition 5.7.1(a).
- b. A file that includes the information required by Condition 5.7.1(b), including the nitrogen content of the fuel relied upon, if greater than zero, to determine the applicable standard pursuant to

Condition 7.1.3(a)(i) and show compliance with such standard and the hourly emission limit pursuant to Condition 7.1.6.

- c. Natural gas fuel usage for the affected gas turbine, ft³/mo and ft³/yr;
- d. Distillate fuel oil usage for the affected gas turbine, gal/mo and gal/yr;
- e. The nitrogen content of the fuel to be used in the affected gas turbine as follows:
 - i. For distillate fuel oil, this shall be recorded for each shipment of oil delivered to the source.
 - ii. For natural gas, this shall be recorded on a daily basis, except as provided in Condition 7.1.8(b).
- f. The sulfur content of the fuel to be used in the affected gas turbine as monitored pursuant to Condition 7.1.8.
- g. The heat content of the fuel used in the affected gas turbine as follows:
 - i. Distillate fuel oil, Btu/gal; and
 - ii. Natural gas, Btu/ft³.
- h. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected gas turbine shall be maintained, based on fuel consumption and the applicable emission factors in Condition 7.1.12, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Pursuant to 40 CFR 60.334(c), periods of excess emissions that shall be reported are defined as follows:
 - i. Nitrogen oxides.

Any period in which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen

allowance used during the performance test required by Condition 7.1.7(a). Each report shall include the average fuel consumption, ambient conditions, gas turbine load, and nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under Condition 7.1.7(a) (see also 40 CFR 60.335(a)) [40 CFR 60.334(c) (1)].

ii. Sulfur dioxide.

Any daily period during which the sulfur content of the fuel being fired in the gas turbine may not comply with condition 7.1.3(c) [40 CFR 60.334(c) (2)].

iii. Emergency fuel.

Each period during which an exemption provided in Condition 7.1.3(b) (i) (B) (see also 40 CFR 60.332(k)) is in effect shall be included in the report required in Condition 7.1.10(a) (see also 40 CFR 60.334(c)). For each period, the type, reasons, and duration of the firing of the emergency fuel shall be reported [40 CFR 60.334(c) (4)].

- b. Emissions of NO_x from the affected gas turbine in excess of the limits specified in Condition 7.1.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(c) is demonstrated by operation of the affected gas turbine with distillate oil with a sulfur content meeting the specification of Condition 7.1.5(c).
- b. Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:
- i. Natural gas combustion emissions.

To determine compliance with Conditions 5.5.1 and 7.1.6, the natural gas combustion emissions from the affected gas turbine shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/mmBtu)</u>
NO _x	0.44
PM	0.0419
SO ₂	0.0006
VOM	0.024

These are the emission factors for uncontrolled natural gas-fired gas turbines, Table 3.1-1, Volume I, Supplement F, October, 1996.

Gas Turbine Emissions (lb) = (Natural Gas Consumed, ft³) x (Heat Content, Btu/ft³) x (The Appropriate Emission Factor, lb/mmBtu)

ii. Distillate fuel oil combustion emissions.

To determine compliance with Conditions 5.5.1 and 7.1.6, the distillate fuel oil combustion emissions from the affected gas turbine shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/mmBtu)</u>
NO _x	0.698
PM	0.061
SO ₂	1.01 S
VOM	0.017

These are the emission factors for uncontrolled distillate oil-fired gas turbines, Table 3.1-1, Volume I, Supplement F, October, 1996. S indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Gas Turbine Emissions (lb) = (Distillate Fuel Oil Consumed, gal) x (Heat Content, Btu/gal) x (The Appropriate Emission Factor, lb/mmBtu)

7.2 Unit 02: Waste Heat Boiler

7.2.1 Description

The Permittee operates a heat recovery boiler system to generate steam for use in the paper manufacturing process. The boiler recovers heat from the turbine exhaust with additional energy provided by a natural gas/distillate oil fired burner in the ductwork between the turbine and the boiler. The heat recovery boiler has a firing rate that exceeds 10 mmBtu/hr, but is less than 100 mmBtu/hr.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Rated Heat Input	Emission Control Equipment
02	Waste Heat Boiler	64.5 mmBtu/hr	

7.2.3 Applicability Provisions and Applicable Regulations

- a. The Waste Heat Boiler is an "affected boiler" for the purpose of these unit-specific conditions.
- b. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- c. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lb/mmBtu) [35 IAC 212.206].
- d. No person shall cause or allow the emission of sulfur dioxide in any one hour period from any new fuel combustion emission unit with actual heat input smaller than, or equal to 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/mmBtu) [35 IAC 214.122(b)].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected boiler is not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of is less than 73.2 MW (250 mmBtu/hr).

- b. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use Of Organic Material.

7.2.5 Operational and Production Limits and Work Practices

- a. The affected boiler shall only be fired with natural gas and distillate fuel oil.
- b. The Permittee shall not utilize distillate fuel oil (Grades No. 1 and 2) in the affected boiler with a sulfur content greater than the larger of the following two values:
 - i. 0.28 weight percent; or
 - ii. The Wt percent given by the formula: $\text{Maximum Wt percent sulfur} = (0.000015) \times (\text{Gross heating value of oil, Btu/lb})$.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the affected boiler is subject to the following:

Operation and emissions of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Heat Input (mmBtu/hr)</u>	<u>Nitrogen Oxide Emissions (lb/hr)</u>	<u>Emissions (tpy)</u>
Heat Recovery Boiler	65.0	17.6	77.1

These limits are based on the maximum actual heat input, the maximum hours of operation (8,760 hr/yr), and the maximum actual emission rate.

The above limitations were established in Permit 87110037, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.7, the Permittee shall maintain records of the following items for the affected boiler to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6 pursuant to Section 39.5(7) (b) of the Act:

- a. Natural gas fuel usage for the affected boiler, Mft³/mo and Mft³/yr;
- b. Distillate fuel oil usage for the affected boiler, gal/mo and gal/yr;
- c. The sulfur content of the distillate fuel oil used in the affected boiler (% by Wt), this shall be recorded for each shipment of oil delivered to the source; and
- d. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the boilers shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from the control and operating requirements as follows pursuant to Section 39.5(7) (f) (ii) of the Act:

- a. Emissions of NO_x in excess of the limit specified in Condition 7.2.6; or
- b. The use of distillate fuel oil with a sulfur content in excess of the limit specified in Condition 7.2.5(b) with the length of time this fuel was used and the effect on emissions of SO₂ within 30 days of this violation being detected.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.2.3(b) and (c) is assured to be achieved by the work-practices inherent in operation of natural gas-fired and distillate oil-fired boilers.

- b. Compliance with Condition 7.2.3(d) is demonstrated by operation of the boiler with distillate fuel oil with a sulfur content meeting the specification of Condition 7.2.5(b).
- c. Compliance with the emission limits of Conditions 5.5.1 and 7.2.6 shall be based on the emission factors listed below:
 - i. To determine compliance with Conditions 5.5.1 and 7.2.6, emissions from the boilers burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lb/Mft³)</u>
NO _x	100
CO	84
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (10 - < 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, Volume I, Supplement D, July, 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, Mft³) x (The Appropriate Emission Factor, lb/Mft³)

- ii. To determine compliance with Condition 5.5.1 and 7.2.6, emissions from the affected boiler burning distillate fuel oil shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Distillate Fuel Oil Emission Factor (lb/1000 gal)</u>
NO _x	20
PM	2
SO ₂	142 S
VOM	0.216

These are the emission factors for uncontrolled distillate fuel oil combustion in commercial/institutional/residential combustors, Tables 1.3-2 and 1.3-15, AP-42,

Volume I, Supplement F, October, 1996. S indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Boiler Emissions (lb) = (Distillate Fuel Oil Consumed, gal) x (The Appropriate Emission Factor, lb/1000 gal)

7.3 Units 03 and 04: Boilers #3 and #4

7.3.1 Description

Boilers #3 and #4 currently are used as back-ups to generate steam for use in the paper manufacturing process and only operate when the gas turbine and heat recovery boiler do not operate. Boilers #3 and #4 use only natural gas as the fuel and each has a firing rate that exceeds 10 mmBtu/hr, but is less than 100 mmBtu/hr.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Rated Heat Input	Emission Control Equipment
03	Boiler #3	30 mmBtu/hr	None
04	Boiler #4	50 mmBtu/hr	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. Boilers #3 and #4 are "affected boilers" for the purpose of these unit-specific conditions.
- b. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the actual heat input of is less than 73.2 MW (250 mmBtu/hr).
- b. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use Of Organic Material.

7.3.5 Operational and Production Limits and Work Practices

The affected boilers shall only be operated with natural gas as the fuel.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the affected boilers are subject to the following:

N/A

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.7, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas fuel usage for the affected boilers, Mft³/mo and Mft³/yr; and
- b. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the boilers shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

N/A

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. Compliance with Condition 7.3.3(b) is assured to be achieved by the work-practices inherent in operation of a natural gas-fired boiler.
- b. To determine compliance with Conditions 5.5.1, emissions from the affected boilers shall be based on the emission factors listed below:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lb/Mft³)</u>
NO _x	100
CO	84
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (10 - < 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, Volume I, Supplement 3, July, 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, Mft³)
x (The Appropriate Emission Factor, lb/Mft³)

7.4 Unit 05: APP Laminator

7.4.1 Description

The APP Laminator is used to laminate two layers of paper together utilizing polypropylene and nylon reinforced strands. The coating is heated prior to its application with a natural gas fired burner with a firing rate that exceeds 0.3 mmBtu/hr, but is less than 10 mmBtu/hr.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
05	APP Laminator	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. The APP Laminator is an "affected coating line" for the purpose of these unit-specific conditions.
- b. The affected coating line is subject to 35 IAC 212.321(a), which provides that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].
 - ii. At the expected process weight rate for the affected coating line; 1,518 pounds per hour, the allowable PM emission rate set by 35 IAC 212.321 is 2.20 pounds per hour.
- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].
- d. The affected coating line is subject to 35 IAC 218.204(c), which provides that:
 - i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the Paper Coatings. The following emission limitation is expressed in units of VOM per volume of coating (minus

water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/liter</u>	<u>lb/gal</u>
0.28	2.3

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected coating line is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the actual heat input of this unit is less than 2.9 MW (10 mmBtu/hr) and the affected coating line is not by definition fuel combustion emission unit.
- b. The affected coating line is not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Sources, because the actual heat input of this unit is less than 73.2 MW (250 mmBtu/hr) and the affected coating line is not by definition fuel combustion emission unit.
- c. The affected coating line is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, which excludes coating lines subject to 35 IAC 218.204 from these requirements.

7.4.5 Operational and Production Limits and Work Practices

The burner shall only be operated with natural gas as the fuel.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the affected coating line is subject to the following:

N/A

7.4.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

- a. On at least an annual basis:

- i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
 - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.4.9(b) directly reflect the application of such material and separately account for any additions of solvent.
 - iii. Upon written request from the Permittee, the Illinois EPA may waive this requirement on a year-by-year basis, if prior testing shows a margin of compliance and no significant changes in coating supplies have occurred.
- b. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) [35 IAC 218.105(a) and 218.211(a)].

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.7, the Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Conditions 5.5.1, and 7.4.3 pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.4.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.

- b. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating as applied on the affected coating line; and
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected coating line.
- c. The amount of product produced on the affected coating line, tons/mo and tons/yr;
- d. The operating schedule of the affected coating line;
- e. Natural gas usage for the burner, Mft³/mo and Mft³/yr;
- f. The aggregate annual PM and VOM emissions from the affected coating line based on the operating schedule and the typical hourly emission rate, with supporting calculations; and
- g. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the natural gas-fired burner shall be maintained, based on fuel usage and the applicable emission factors, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing deviations from Condition 7.4.3(d) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.
- b. Emissions of PM from the affected coating line in excess of the limits specified in Condition 7.4.3 based on the operating rate and emission factor in Condition 7.4.12 within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.4.3(b) and (c) is assured to be achieved by the work-practices inherent in operation of a natural gas-fired burner.
- b. To determine compliance with Conditions 5.5.1 and 7.4.3, emissions from the affected coating line shall be calculated based on the following:

- i. Volatile Organic Material Emissions:

$$\text{VOM (lb)} = (\text{Coating Usage, gal}) \times (\text{VOM Content of Coating, lb/gal})$$

- ii. Particulate Matter Emissions:

To determine compliance with Conditions 5.5.1 and 7.4.3 PM emissions from the affected coating line shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/ton)</u>
PM	1.2

This is the emission factor for particulate matter from asphalt roofing manufacturing in uncontrolled shingle saturation: dip saturator, drying-in drum section, wet looper, and coating, Tables 11.2-2, and 11.2-4, AP-42, Volume I, Supplement F, January, 1995.

$$\text{PM (lb)} = (\text{Amount of Product Produced, ton}) \times (\text{The Appropriate Emission Factor, lb/ton})$$

- c. To determine compliance with Condition 5.5.1, fuel combustion emissions from the burner shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/Mft³)</u>
NO _x	100
CO	84
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 - < 10 mmBtu/hr), Tables 1.4-1 and 1.4-2, Volume I, Supplement D, July, 1998.

Burner Emissions (lb) = (Natural Gas Consumed, Mft³)
x (The Appropriate Emission Factor, lb/Mft³)

7.5 Units 06 and 07: Asphalt Saturator and Asphalt Laminator

7.5.1 Description

Two asphalt lines apply solutions of molten asphalt to paper. In an asphalt saturator heavy-weight paper is immersed in asphalt to produce a moisture barrier.

In an asphalt laminator two paper sheets are combined into a double ply product, with asphalt as the binder. Reinforcement (e.g., nylon strands) may also be included along with the asphalt for more strength.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
06	Asphalt Saturator	None
07	Asphalt Saturator	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. The Asphalt Saturator and the Asphalt Laminator are "affected asphalt lines" for the purpose of these unit-specific conditions.
- b. The affected asphalt lines are subject to 35 IAC 212.321(a), which provides as follows. For purposes of this rule, the affected asphalt lines are considered similar emission units.:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
 - ii. At the expected process weight rate for the affected asphalt lines of 5,290 pounds per hour, combined, the allowable PM emission rate set by 35 IAC 212.321 is 4.27 pounds per hour, combined.
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the

limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.5.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected asphalt lines not being subject to 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, because the affected asphalt lines do not meet the applicability of 35 IAC 218.920(a) and (b). In particular, these affected asphalt lines, in aggregate have:

- a. Maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year; and
- b. A potential to emit for VOM that is less than 22.7 Mg (25 tons) per year.

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the affected asphalt lines are subject to the following:

Emissions of VOM from the affected asphalt lines shall not exceed 24.9 tons per year. As a result, the affected asphalt lines are not subject to the control requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes.

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.7, the Permittee shall maintain records of the following items for the affected asphalt lines to demonstrate compliance with Conditions 5.5.1, 7.5.3, and 7.5.6 pursuant to Section 39.5(7)(b) of the Act:

- a. The amount of product produced on the affected asphalt lines, tons/mo and tons/yr;

- b. The operating schedule of the affected asphalt lines;
and
- c. The monthly and aggregate annual PM and VOM emissions from the affected asphalt lines based on the amount of material produced on the affected miscellaneous product manufacturing process units, the operating schedule, and standard emission factors, with supporting calculations.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from the control and operating requirements of this permit as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that this emission unit is exempt from those requirements [35 IAC 218.990].
- b. Emissions of PM or VOM from the affected asphalt lines in excess of the limits specified in Condition 7.5.3 or 7.5.6 based on the operating rate and emission factors in Condition 7.5.12 within 30 days of such an occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 5.5.1 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1, 7.5.3, and 7.5.6 emissions from the affected asphalt lines shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/ton)</u>
PM	1.2
VOM	0.091

These are the emission factors for asphalt roofing manufacturing in uncontrolled shingle saturation: dip saturator, drying-in drum section, wet looper, and coating, Tables 11.2-2, and 11.2-4, AP-42, Volume I, Supplement F, January, 1995.

Saturator or Laminator Emissions (lb) = (Amount of Product Produced, ton) x (The Appropriate Emission Factor, lb/ton)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ **{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15) (a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15) (b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7) (o) (v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7) (i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Emissions of Particulate Matter from Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where

P = Process weight rate; and
E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature _____

Name _____

Official Title _____

Telephone No. _____

Date Signed _____

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
 - Do not violate any applicable requirement;
 - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits?		<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

I. INTRODUCTION

This source has applied for a renewal of its Clean Air Act Permit Program (CAAPP) operating permit. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Ivex Packaging Corporation produces 100% recycled paper from secondary paper fiber. The plant has three major departments: Paper Mill, Finishing Department, and Waterproof Department. The source operates a power plant which includes boilers and a gas turbine with a heat recovery boiler. The Waterproof Department has three operations which generate emissions: a laminator, a saturator, and an APP laminator.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Solar Turbine Incorporated Gas Turbine Model # Centar HT-5701 (Gas Turbine)	1988	None
02	Waste Heat Boiler	1988	None
03	S and G Natural Gas-Fired Boiler (Boiler #3)	Prior to 1973	None
04	B and W Natural Gas-Fired Boiler (Boiler #4)	Prior to 1973	None
05	APP Laminator	Prior to 1973	None
06	Asphalt Saturator	Prior to 1973	None
07	Asphalt Laminator	Prior to 1973	None
PM Fugitive Emissions	Paved and Unpaved Roadways and Parking Lots	----	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO _x)	189.36
Particulate Matter (PM)	23.95
Sulfur Dioxide (SO ₂)	17.74
Volatile Organic Material (VOM)	9.64
HAP, not included in VOM or PM	----
Total	240.69

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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